

STATE OF NEW YORK
SUPREME COURT COUNTY OF ONONDAGA

Index No.:

RUSSELL WALTERS,

Plaintiff,

VERIFIED COMPLAINT

-against-

STANLEY L. HAMLIN,

Defendant.

Plaintiff, Russell Walters, by and through his attorneys, the Lynn Law Firm, LLP,
complaining of the defendant, Stanley L. Hamlin ("Hamlin" or Defendant), herein respectfully
alleges and shows to the Court as follows, upon information and belief:

1. At all times herein mentioned, the Plaintiff was and still is a resident of the
County of Onondaga, State of New York.

2. At all times herein mentioned, the Defendant was and still is a resident of the
County of Onondaga, State of New York.

3. At all times herein mentioned, defendant Hamlin was at all times over the age
eighteen.

4. At all times herein mentioned, defendant Hamlin committed conduct that
constituted sexual offense(s) as defined in article one hundred thirty of the New York Penal
Law against the plaintiff, Russell Walters, while the plaintiff, Russell Walters, was under 17
years of age ("sexual offenses").

5. Sexual offenses alleged herein were committed in or about the County of
Onondaga, State of New York.

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6. As a result of defendant Hamlin's conduct, the plaintiff, Russell Walters, suffered physical, psychological and other injuries.

7. That this action falls within one or more of the exceptions as set forth in CPLR 1602.

8. The Court has jurisdiction over this action. Venue is proper in Supreme Court for the County of Onondaga, State of New York. The action is timely commenced pursuant to the New York State Child Victim's Act.

AS AND FOR A FIRST CAUSE OF ACTION
AGAINST DEFENDANT HAMLIN:

9. Plaintiff repeats and realleges each and every allegation contained in paragraphs marked and enumerated "1" through "8" hereinabove and further states as follows:

10. At all times herein mentioned, on multiple occasions in or about Onondaga County defendant Hamlin intentionally had sexual contact, molested, committed lewd and lascivious acts, sodomy and committed other such sexual offenses against the plaintiff, Russell Walters, while the plaintiff, Russell Walters, was a minor all in violation of the New York Penal Law and those acts caused the plaintiff, Russell Walters, to suffer physical, psychological and other injuries as a result of defendant Hamlin's conduct.

11. As a result of the foregoing, the plaintiff, Russell Walters, sustained serious, severe and permanent personal injuries and will continue to suffer in the future.

12. The amount of damages sought in this action exceeds the jurisdictional limits of all lower courts that would otherwise have jurisdiction.

AS AN D FOR A SECOND CAUSE OF ACTION
AGAINST DEFENDANT HAMLIN:

13. Plaintiff repeats and realleges each and every allegation contained in paragraphs marked and enumerated "1" through "12" hereinabove and further states as follows:

14. In doing the criminal, extreme and outrageous acts alleged, defendant Hamlin acted intentionally, maliciously, and recklessly, for the purpose of causing the plaintiff, Russell Walters, harm, humiliation, mental anguish, and severe emotional and physical distress.

15. Defendant Hamlin's outrageous actions caused the plaintiff, Russell Walters, severe emotional and physical distress. The emotional distress sustained by the plaintiff, Russell Walters, was severe and of such a nature that no reasonable person could be expected to endure it.

16. As a result of the foregoing, the plaintiff, Russell Walters, sustained serious, severe and permanent personal injuries and will continue to suffer in the future.

17. The amount of damages sought in this action exceeds the jurisdictional limits of all lower courts that would otherwise have jurisdiction.

WHEREFORE, the plaintiff, Russell Walters, demands judgment against the defendant, Stanley L. Hamlin, in a sum exceeding the jurisdictional limits of all lower courts which might otherwise have jurisdiction together with the costs and disbursements of this action.

Dated: October 18, 2019
Syracuse, New York



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LYNN LAW FIRM, LLP ATTORNEYS AT LAW SYRACUSE, NEW YORK

INDIVIDUAL VERIFICATION

STATE OF NEW YORK)
) ss:
COUNTY OF ONONDAGA)

Russell Walters, being duly sworn, says that he is the plaintiff in the above-named proceeding and that the foregoing Summons and Verified Complaint is true to the best of his knowledge, except as to matters therein stated to be alleged upon information and belief, and as to those matters, he believes them to be true.


Russell Walters

Sworn to before me this
18th day of October, 2019.


Notary Public

KELSEY W. SHANNON
Notary Public-State of New York
No. 6360923
Qualified in Onondaga County
Commission Expires June 26 2021